

Dear FCC Decision Makers,

Thank you for your strong stand on Low Power FM. but we are seriously losing the battle.

Currently our 7 year old Payson, AZ, LPFM station is scheduled (in the near future) to be gobbled up by a full power station - and told to move or die. This is the same station Senator McCain publically lauded at a Town Meeting in Payson (and I thank him for that).

I used the Rec tool to find another frequency when I discovered the one I am on will go away - sometime in the next 6-12 months. I applied for, and received, a construction permit - which will sit there until the last gasp as an escape route. I am currently on 96.3 and will move to 96.7. This will require added expense, of course. Retuning the pass cans, retuning the translator receivers - one of which even has pass cans on the receive side. Rebuilding the isocoupler on the AM tower, etc. Figure \$2,000+. Then there is new letterhead, envelopes, four sets of business cards, newspaper advertising, 4x6 cards which I have in plastic holders in every motel room in town, etc. Figure another \$1,000. Will the full power station give me the \$3,000 plus labor costs? (maybe \$5,000 total) I think not! As a side note, let me also express my extreme gratitude for the hard work that both www.Recnet.com and Prometheus Radio Project do!

The desire of the full power station to move was purely monetary. Now they have a solid rim-shot into Phoenix, instead of covering Wickenburg - their original city of license. Wickenburg loses their only local FM station and the station owners gain. Then they will sell the new station for 10-15 million for a extremely tidy profit. Now why on earth would the FCC allow this sort of thing - again, and again, and again? The FCC, themselves, changed the rules so the full power stations can now change the city of license and cluster around the big cities, leaving rural areas with no FM radio. Of course this very move places a lot of LPFM stations at financial risk, if not total ruination. I fault the Commission, not the hard working FCC engineers who are simply following the rules.

This is why primary status was so very important. This is why primary status should have lead each and every discussion about LPFM. Regardless of all the talk about what we "won", the simple fact is it was pretty much a hollow victory. NAB won. NPR won. Clear Channel, et al won. I thank you for your considerable effort in this regard but LPFM is too scattered, too young, too broke, and too unorganized to do much about it.

Here is where we now stand:

- 1- Translators and LPFM are still both secondary - and equal. (we lost)
- 2- Translators can put out a superior signal. 250 watts ERP at almost 200' verses LPFM at 100 watts ERP at 100'. (we lost)
- 3- Translators can be owned by almost anyone at any time, no resident board members required.
- 4- Full power FM stations can change their "city of license" at will. (we lost)

5- Newspapers can now be station owners in major markets - and petition for other markets not currently on the list. (we lost)

6- LPFM stations still have a hard time financially. No grant money. No agency money. Strict underwriting policy. (we lost)

7- LPFM HAAT radials are still 10 miles, instead of a more realistic 2 miles. From an engineering standpoint this is ludicrous. (we lost)

8- Many LPFM stations are still left to struggle with extremely low ERP. I was granted 3 watts and yet I live in a large valley (Payson, AZ). (we lost)

Having played college level sports for four years I would view this not as a victory (moral or otherwise), but as a royal butt kicking!

Sincerely,
Steve Bingham